Section 4.2.7

Enhanced Directory Assistance Services

- *Announcement Subsystem* — This subsystem provides audio information for system users on an automated basis.
- *Detection Subsystem* — This subsystem provides the capability to detect and decode system user inputs on an automated basis.
- *Report Subsystem* — This subsystem prepares reports for system administrators and provides data for downstream processes.

4.2.7 Features

If implemented by a LEC, the features supported by the OSS are divided into several categories: features common to operator services, customer access features, customer listing information, custom call-handling features, and special billing features.

- *Features common to operator services* include *calling-*, *called-*, and *billed-number determination*, which provide the capability for an operator to enter (or the operator system to determine) the calling, called, and billed number.
  - — Service Determination and Handling Method are features that allow an operator to enter, or the system to determine, the specific service and the handling method requested by the caller.
  - — Initial Call Processing provides the capability for the OSS to determine customer-dialed digits and to request and interpret post-seizure dialing information.
  - — IntraLATA/InterLATA Check provides the capability to determine whether a request for call completion is intraLATA or interLATA.
  - — Interexchange Carrier Code Processing allows the OSS to offer service or to direct calls to interexchange carriers.
  - — Sequence Call Processing allows a customer to request further action while connected to an OSS.
  - — Terminating Inward Service provides the capability to receive requests from remote originating OSSs for service on various calls including emergency assistance, directory assistance, call completion, busy line verification, operator interrupt, and calling card verification.
- *Customer access features dialing instruction* provides the capability for a customer to access an operator to obtain information on how to dial a call to a specific location.
  - — Rate Information allows the system to provide a customer with information about charges for telephone calls. CAMA allows an operator to be bridged onto a CAMA call to obtain the calling number from the customer.
  - — Credit Recording provides the capability for a customer to access an operator and request credit on a call that encountered network trouble such as wrong number, poor transmission, lost coins, or cutoff.

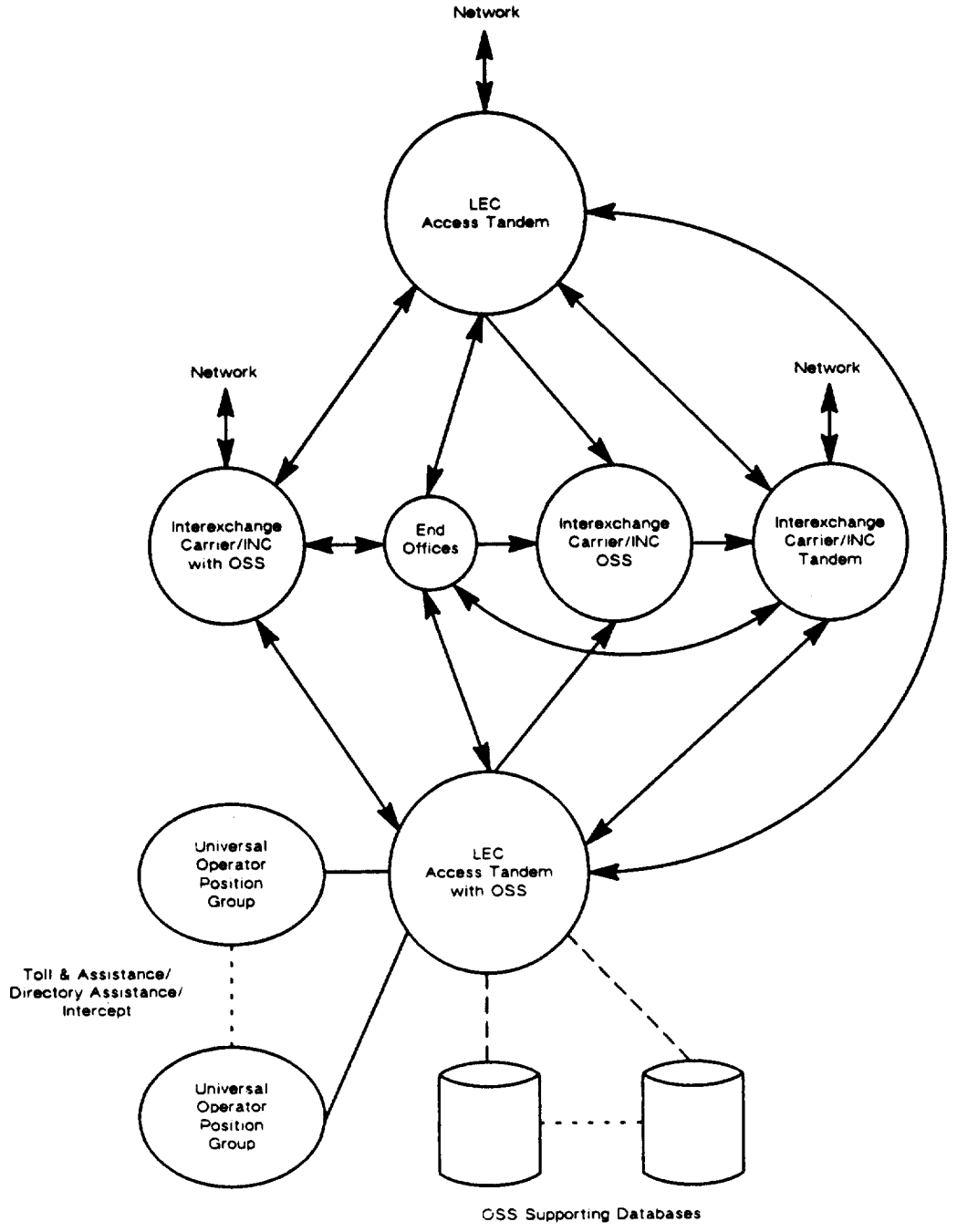

Figure 4-2. Existing Operator Services Systems (OSSs)

— Trouble Reporting provides the capability for a customer to report network troubles to an operator or trouble-recording attendant, who will key the trouble report codes and/or details into the OSS.

— Call to and from Nondialable Points is a feature that allows calls to be made to and from nondialable points.

— Official and Employee Telephone Numbers is a feature that allows customers of some LECs to obtain official and employee telephone numbers.

— Coin Line Identification provides the capability for a customer to access an operator and request the coin station identity.

— General Information provides the capability for a customer to obtain information such as the time of day, weather, day, and date from an operator or via an announcement machine.

— Place Name provides the capability for a customer to obtain a locality name for a given central office code.

— Independent Region allows the operator to answer a customer asking if a particular telephone number is served by an independent LEC.

— Information Source Access provides the capability for a customer at a computer terminal equipped with the appropriate interface to access public databases via the OSS and telephone networks.

— Ringback service provides the capability for a customer to request that the operator call back to determine that the station set rings on an incoming call.

— Intercept provides the capability for a customer to be informed that a working number is no longer in service, or why a working number is no longer in service.

- *Customer listing information features* are features that allow customers to obtain information through the OSS, either by an operator or via an announcement machine. This category of OSS features includes one of the most popular operator services — directory assistance.

  — Directory Assistance provides the capability for a customer to obtain the listed telephone number for a given name and address.

  — Customer Name and Address allows a customer to obtain the name and listed address, including zip code, associated with a telephone number.

  — Address Provision allows a customer to obtain the listed address associated with a subscriber name.

  — Name and Telephone Number Provision allows a customer to obtain the name and telephone number associated with a listed address.

  — Zip Code Provision allows a customer to obtain the postal zip code for an address.

— Direct Customer Access allows a customer to access the LSDB and retrieve customer-listing information.

— Area Code service allows a customer to obtain the area code of a given city, state, or locality.

— Nonpublished Number Callback allows a customer to request that the operator transmit a callback request to a party having a nonpublished number.

— Area Business Listing allows a customer to obtain business listings based on the area indicated by the customer and the business category or trade name.

- *Custom call-handling features*

— Automated Callback provides the capability for a customer who is unable to establish a connection to a desired station because of a busy signal or because there is no answer, to receive an automatic callback when the station becomes free.

— Message Delivery is a feature that provides the capability for a customer to request that an operator deliver a message to a specified telephone number or to a particular person.

— Busy-Line Verification is a feature that allows a customer to request that the operator perform a busy-line verification to verify if a given line is in a talking, nontalking, or idle state.

— Operator Interrupt provides the capability for an operator, at customer direction, to interrupt an established connection

— Emergency service provides the capability for a customer to obtain "emergency" numbers, such as police, fire, hospital, etc., or to request the operator to complete an emergency call.

— Call Completion service provides the capability for the OSS to complete calls for customers.

— International Calling provides the capability for the OSS to complete international calls for customers.

— Person service provides the capability for a customer to obtain a custom-handled, operator-completed call to a specific party at the terminating end.

— Conferencing is a feature that allows three or more customer stations on a bridged circuit to simultaneously speak and hear all connected parties.

— OSS call handling for specialized attendant groups is a feature that provides the capability for the system to distribute incoming calls to specialized groups of attendants who provide general or business-type information to customers.

EXHIBIT 2

EXCERPTS FROM NANP ADMINISTRATOR'S PROPOSAL ON THE FUTURE OF NUMBERING IN WORLD ZONE 1

Section 4.2

Proposed Allocation of NPAs to Service Access Codes

4. Allocation of NANP Resources After the Implementation of Interchangeable NPA Codes

The 1995 implementation of interchangeable NPA codes will add 640 NPA codes to the NANP inventory. This addition increases the number of codes from the current 152 to 792 and has been the basis for speculation regarding the future assignment and use of this expanded resource. **This numbering plan proposal recommends a method for the allocation of the 640 NPA codes for the purposes detailed below.** These proposed reservations are based on projected requirements for the period covered by this numbering plan proposal (1995 - ~2025). Specific code assignments will occur after a determination of need has been established. The proposed reservations are flexible. If the predictions are not substantiated over time, the reservations for specific applications will be revised to reflect actual needs.

The reservation of 470 of the 640 interchangeable NPA codes for specific applications/purposes results in 170 codes reserved for continued growth, beyond 2025, in any of the applications detailed below. Appendix E presents the code reservation in two charts depicting the allocation projections and the allotment of the 640 codes by application/purpose.

4.1 Reservation of NPA codes for geographic assignment

The function of numbers within geographic NPA codes is to address terminal devices (e.g., PSTN/ISDN, cellular, pager, and centrex/DID). Based on the continuation of this functionality, it is proposed that **300 of the new 640 NPA codes be reserved for assignment as geographic NPA codes.** The reservation of 300 geographic codes will ensure the availability of two growth codes per existing NPA between 1995 and 2025. The current prediction is that there will be 144 geographic NPA codes working in 1995. The two growth codes per NPA is an average; there will be NPAs that will require upwards of four codes in that time period and those that will require no additional code assignments. The NANPA attempted, with the assistance of Bellcore statisticians, to predict accurately the number of codes required during the 30 year period. However, due to the recent and anticipated future explosion of new service applications, the historical data available was insufficient to render a statistically acceptable prediction.

The reservation of codes need not be sequential with respect to numerical value. A NANPA study is currently underway to determine the most effective method of assigning and reserving geographic NPA codes. Although there is no plan to recover currently assigned geographic NPA codes with low central office code fill, new NPA codes will continue to be assigned only after code exhaust is adequately substantiated to the NANPA.

4.2 Reservation of NPA codes for non-geographic assignment

There are services such as personal communications under development that propose architectures utilizing a database(s) or other method of digit analysis to determine the relevant location of the terminating user or terminal device, i.e., user or terminal mobility/portability. The use of indirect addressing and associated signaling referrals inherent in the developing service descriptions for these services and the projected user interest in the services, support the **reservation of 90 NPA codes for non-geographic applications - 80 for personal communications applications and 10 for** growth as Service Access Codes (SACs). There is no accurate way to predict the future

need for non-geographic codes since the services requiring them are not yet defined. The 80 code reservation is based on preliminary industry estimates of potential personal communications subscribers as well as the potential advantages of reserving a block of codes having a common middle (or "B") digit for ease of user recognition. These non-geographic applications are projected to be in three varieties.

1. *Area code assignments for NANP-wide and/or nationwide database applications with fully shareable use of a database by multiple providers.*

The database transaction offers either trunk routing advice or a secondary referral. The assignment of dedicated NPA codes to these applications is appropriate for caller recognition that the destination user/terminal is mobile. The dedicated code also informs the network that the call must be routed based on the content of the NANP-wide and/or nationwide database (first indirect address). The function of the NANP-wide and/or nationwide database will be either to (1) identify and refer the call to the service provider's database (second indirect address) where the current location (direct address) of the end-user resides, or (2) to initiate trunk routing to the appropriate end user (direct address) via the indicated transport carrier. The first instance is that of a personal communications application with both (1) an NANP-wide or nationwide database and (2) service provider databases. The second instance is that of the 800 database or a personal communications application with only an NANP-wide or nationwide database. In either instance, line numbers (full 7-digits), within the non-geographic NPA codes, will be assigned to the end user whose profile will identify the service provider of choice. For diagrams see Appendix F.

2. *Central office code assignments (within non-geographic area codes) for non-geographic applications not using a fully shareable database, but requiring separately and centrally administered blocks of numbers to support referrals to service providers.*

In order to offer personal communications-like services in an environment without an NANP-wide or nationwide database, CO codes within dedicated non-geographic area codes will be assigned to service providers. The appropriate network node will perform a 6-digit translation[6] on the dialed digits to determine the appropriate service provider. Given a suitable signaling arrangement, the service provider will receive and translate the dialed digits to determine the current location of the terminating end-user. Numbering to facilitate access to information in a database represents new functionality. The database 'service provider' may or may not have independent status as a network provider/carrier. The role of numbering is to facilitate the referral process for data retrieval, without regard to the ultimate network provider(s)/carrier(s). The calling party's carrier preference is honored as before, but may be considered tentative until charging issues are clarified. Thus 'network identification' is clearly differentiated from 'database provider' identification. The latter may rely on signaling access alone and is nodal in character. The similarity to '800-NXX' usage extends only to digit analysis. There need be no "presence" other than signaling arrangements capable of reaching the database provider. Guidelines should seek to

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[6] The 6-digits translated are the first six of the numbering scheme (excluding prefixes). NANP-wide, the 6-digits include the area code and the CO code (NPA+NXX). Internationally, digit analysis is only required for up to 4-digits prior to Time T (December 31, 1996), including the country code (i.e., country code and area code [1+NPA] for calls destined for North America). After Time T, international digit analysis is expanded to up to 6-digits (i.e., country code, area code, and 2-digits of the CO code [1+NPA+NX] for calls destined for North America).

establish eligibility for service provider status that is consistent in terms of availability and fault recovery, since the referral function is critical with respect to all subsequent call processing by other service providers.

The potential for an evolution of this architecture to a fully shareable database application will require central administration of the CO codes, while the end-user line numbers will be administered by the service provider.

3. *Service Access Codes (SACs) assigned for unique services and functions.*

SACs have been assigned for services with a variety of non-uniform functions, i.e., (1) fully shareable database with a unique billing arrangement - 800 database service; (2) service provider identification with the potential for the same terminating "line number" working in multiple locations - 900 service for polling/survey events; (3) NPA code assigned to interexchange carriers for each to use the full complement of 8 million numbers for the implementation of network-based services - 700 code. Presuming a need for uniquely functional non-geographic codes in the future, **10 new NPA codes will be reserved** for that purpose. The 10 code reservation is based solely on the availability of easily recognizable (e.g., 211, 311, 234, 345, etc.) codes, not on a SAC market projection. Spare N11 formatted codes (211, 311, etc) may be appropriate for this application, as NPA codes with full 10-digit dialing. The potential for assignment of the remaining, and potentially recoverable, N11 codes for an appropriate nationwide abbreviated 3-digit dialing application, is remote.

The 80 reserved codes proposed for personal communications applications will be apportioned between applications 1 and 2 in a manner that reflects the speed of database development, evolution, and deployment. As large nationwide or NANP-wide databases are deployed, more codes will be required for application 1 and less for application 2. There is no information to date by which to project the eventual apportionment.

4.3 Reservation of NPA codes for the ultimate expansion of the NANP to beyond 10-digits

The NANP will eventually (after 2025) exhaust its 10-digit format, thereby requiring a format expansion. The expansion plan recommended in Appendix G requires the **reservation of 80 NPA codes** for transition and a "grace period" where both the new and the old formats would be usable.

4.4 Reservation of NPA codes for unanticipated/unidentified future needs and/or the perpetuation of the 10-digit format beyond 2025

The proposed total reservation of 470 NPA codes as detailed above in Sections 4.1-4.3 does not address the potential for unanticipated events, unidentified number resource applications, unanticipated growth, and/or the desired maximal longevity of the 10-digit NANP format.

1. Unanticipated events - changes in national, state, provincial, or local public policy decisions that may require the allocation of additional numbering resources. An example is the potential for local exchange competition that could require the assignment of CO codes to multiple local exchange carriers.

Section 7.2

Implementation of *XXX Codes

7. The Evolution of Numbering in WZ1

Section 4 contains the recommended method of allocating the 640 interchangeable NPA codes and is viewed as the short-term proposal for the NANP. Section 5 contains goals and predictions for the future (~2025) of the telecommunications industry and is viewed as the long-term proposal for the NANP. Along this time scale, extending from 1995 to 2025 and beyond, is the period of evolution and transition - the period where the NANP resources and design of 1995 gradually, and in a controlled and planned manner, develop into the resources and design of the future. There is no recommended time by which each of the long-term goals will, or should, be implemented. It is recommended rather that there be an effort first to achieve industry and public consensus that these goals are indeed those which the industry will evolve to and then jointly develop the method by which this evolution will take place. Some specific examples of the evolution anticipated for the recommended goals and the method of study are:

7.1 Universal 10-digit dialing

The plan for evolving the current multiplicity of dialing schemes to full 10-digit dialing would start with the implementation of overlay NPA codes in metropolitan areas. The evolution would continue through the willing participation of carriers and users within other NPAs, generally coincident with another dialing/numbering change (e.g., NPA code exhaust) within the NPA, not as a unilateral action. The growth of non-geographic NPA codes will also stimulate the evolution toward 10-digit dialing. The NANPA would coordinate the evolution and provide the motivation by reinforcing the advantages of 10-digit dialing. It is strongly recommended, as a short-term goal, that the dialing of 10-digits, when only 7-digits are required, not result in a call failure.

The implementation of a full 10-digit dialing plan requires user awareness that a 10-digit number is always acceptable and does not necessarily connote a toll charge.

7.2 Numbering/dialing plan integration

Although a lofty and complex goal, its evolution should start with industry concurrence that new numbering/dialing plans (including prefixes) will be implemented only when the needs of the industry and its users can not be met within the current plans and formats, not merely for convenience. Current numbering/dialing plans will continue basically as they are for the near-term. Specific instances should be investigated as study warrants (e.g., elimination of the "1" prefix with full 10-digit dialing and the use of another method, e.g., tones or announcements or out-of-band signaling) to indicate a toll call and/or its approximate cost. Likewise, efforts should be made to bring into uniformity existing numbering/dialing plans, e.g., the current effort to use vertical services codes (*XX[X]) uniformly across wireline and wireless networks. The more expansive integration of numbering/dialing plans, particularly within E.164 and the NANP, can only occur concurrently with the expansion of the plans.

Appendix H

Parties Consulted in Preparation of Numbering Proposal

Appendix H

Long-Term Numbering Plan (LTNP) Interview Process

During the second half of 1990 the NANPA conducted telecommunications sector interviews of experts and futurists in the field of telecommunications. It was intended, and every effort was made, to obtain interviews representative of the broad and diverse segments of the telecommunications sector. In some cases, interviews were denied on either the basis of availability or the perception that the information sought by the NANPA was proprietary. In an effort to address the latter, the NANPA committed to keeping proprietary the specific comments of those interviewed. Attachment A contains a list of entities and futurists/experts that participated in the interview process.

In most cases, the interviews took approximately 2 hours. The discussion, in all cases, was frank, cooperative, and very informative. In order to assist discussion, a list of questions was sent to each person to be interviewed in advance of the interview. The questions were not provided for answer during the interview, but only to assist the person to be interviewed in preparing for the areas to be discussed during the interview.

The NANPA expresses sincere appreciation for those agreeing to be interviewed. This project would not have been nearly as successful without their thoughtful input.

At the end of the interview process, the NANPA consolidated the views expressed by those interviewed into a list of perceptions and issues derived from the interviews. Where there were conflicting views expressed by those interviewed, it is evident. Otherwise, those interviewed were generally in agreement with the perceptions and issues. Attachment B contains select concerns and general conclusions derived from the interview process. For those interested, a more detailed analysis is available from the NANP Administrator by calling Jean Mobley on 201-740-4661.

Appendix H (Attachment A)

LTNP Interviews - by Industry Sector

World Zone 1:

Interexchange Carrier:	AT&T:	Bob Lucky
	MCI:	Henry Sinnreich
Local Exchange Carrier:	Ameritech:	Joel Engel
	BellSouth:	Don Jones
	GTE:	Leland Schmidt
	Pacific Bell:	Mike Bandler, Marty Kaplan
	USTA:	Paul Hart
Canadian Carrier:	Bell Canada:	Hugh Burrows
	Telecom Canada:	Bob White & staff
Research/Association:	AT&T:	Bob Lucky
	Bellcore:	Irwin Dorros, Gary Handler, Bob Whitefleet, Gary Herman, Steven Minzer, Bob Keevers, Phil Porter, Ming Lai
	BNR:	John Luetchford
	SRI:	Edward Means, Tom Mandel, Linda Bruns
Government Agency:	FCC:	Peyton Wynns, Ken Stanley, Jerry Vaughn
	NTIA:	Bill Maher
	State Department:	Earl Barbely
	Canadian Department of Communications:	Dorothy Phillips, Thomas Whalen, Andrew Patrick
Vendor:	AT&T:	Bob Lucky
	IBM:	John Felton, Terry Smetanka, Norman Cowder
RCC:	CTIA:	John Stupka
	SWB Mobile Services:	John Stupka
	Telocator:	Tom Stroup
	McCaw Cellular:	Nicolas Kauser

International:

Carrier:	Australia Telecom:	Cliff Mathieson
	British Telecom:	David Halliday, David Leakey
	Nippon T&T:	Yoshimasa Tokui
Research/Association:	CCITT:	John Tar
	Ovum (Great Britain):	Claire Milne
Government Agency:	Oftel (Great Britain):	Geoff Knight

Appendix H (Attachment B)

Perceptions and Issues Derived from LTNP Interviews

OVERVIEW

- General Concerns Regarding The Development of a LTNP:
  - Can not presume to offer a stable prediction for 30 years hence.
    - Current knowledge insufficient.
    - LTNP must be a flexible and "living" document.
    - Must identify and recognize alternatives.
  - Ensure adequate representation of industry sectors in the data gathering process.
  - Identify the process most likely to gain industry and regulatory support for the proposed LTNP.
  - Topic of most interest to those interviewed: Personal Communications.
  - Let moderation prevail, not grandiose predictions.
- Select General Conclusions From Interviews:
  - All aspects of society will become increasingly decentralized.
  - Equally sophisticated capabilities will be required for home, office, and mobile telecommunications.
  - Personal communications will be both a wireline and wireless service, with wireless as as adjunct to, not a replacement for, wireline.
  - Intelligent Network is the platform for the future.
  - A seamless/virtual seamless network is required to ensure ease of user access and interworking in a multi-vendor environment.
  - The level of cooperation between industry entities will ultimately determine the business success of the North American industry.
  - Competition is here to stay, the degree of regulation is less predictable.
  - The future requires flexible charging with integrated billing.
  - Fixed and mobile addresses will coexist for the foreseeable future.
  - By 2020, a user interface, not the user, will likely perform network connectivity and addressing functions.
  - Numbering must be an enabler, not an impediment.

EXHIBIT 3

BOC CORRESPONDENCE REGARDING COX'S N11 REQUESTS

U S West Letter to Cox

U S WEST Communications, Inc.
1005 17th Street Suite 200
Denver, Colorado 80202
303 896-3737

James A. Smith
Colorado Vice President

U S WEST COMMUNICATIONS

March 11, 1992

Mr. George Orbanek
Editor and Publisher
The Daily Sentinel
P.O. Box 668
Grand Junction, CO 81502

Dear George:

Thank you for your February 18, 1992, letter requesting a 3-digit dialing arrangement in the "N11" format to enable the Daily Sentinel to offer an "electronic classifieds" service to its customers. As you know, U S WEST Communications supports the development of a robust electronic information services marketplace which uses the public telecommunications network, and considers it a favorable development that your publication plans to introduce such a service.

U S WEST Communications will gladly discuss the various dialing access and billing and collection services currently available to meet your needs. In addition to these options, we plan to expand our billing and collection services to support the kind of "electronic classifieds" service you have described. Since the timing and exact form of this service are not yet determined, we have an opportunity during its development to reflect the Daily Sentinel's needs. I will ask a product development specialist to contact you soon to set up a time to discuss your requirements.

Your specific request for assignment of "511" dialing access seeks the assignment of a numerically-scarce "N11" code to one among many thousands of information service providers. If the small handful of such codes were assigned to this function, the potential demand would far exceed the supply. Your request therefore raises public interest issues of national scope.

On March 5, 1992, in response to such a request from Cox Newspapers, BellSouth asked the Federal Communications Commission to open a proceeding to review the attendant public interest issues. The FCC is expected to solicit comments on the matter. U S WEST expects to take part in this proceeding, along with other concerned parties, such as the Daily Sentinel or its parent corporation. In the interim, U S WEST Communications will not be assigning an "N11" number pursuant to your request. We will, of course, be happy to discuss with you the other available access options for your new service, as referenced above.

Again thank you for your letter. We look forward to assisting you in your new information services venture.

Sincerely,

Cox Letter to Ameritech

COX
NEWSPAPERS
A DIVISION OF COX ENTERPRISES, INC
POST OFFICE BOX 105720
ATLANTA, GEORGIA 30348

JIM McKNIGHT
VICE PRESIDENT OF TELECOMMUNICATIONS

(404) 843-7936

April 17, 1992

Mr. Robert M. Weger
Manager, Information Services
Ameritech Services
45 Erieview Plaza
Room 1260
Cleveland, Ohio 44114

Dear Bob:

Please let me summarize, strictly from my point of view, the results of our meeting in Dayton regarding the request for "N11" service in Dayton and Springfield:

1. Ameritech is not sure whether they want to provide N11 service.

2. Ameritech is now interested in providing 976 service to us, even though we were denied this service in previous requests.

3. Ameritech is not sure whether they are going to provide information services via the 411 network.

4. Ameritech is not going to give us an answer on N11 until after the FCC issues a declaratory ruling on the BellSouth request.

5. All of our business plans for local pay-per-call information services in Ameritech territory are at the mercy of Ameritech's decision to provide or not provide the network elements necessary to execute those plans.

I trust that you will forward this correspondence to the appropriate decision makers within Ameritech for resolution.

Sincerely,

Jim McKnight

bl
cc Charlie Rinehart
Brad Tillson
Doug Franklin

Southwestern Bell Letter to FCC

Southwestern Bell Telephone

The One to Call On™

March 30, 1992

D. T. Hubbard
Vice President

The Honorable Alfred C. Sikes
Chairman
Federal Communications Commission
1919 M. Street, N.W., Room 814
Washington, D.C. 20554

Dear Chairman Sikes:

RE: BellSouth Petition for Expedited Declaratory Ruling Regarding Assignment of N11 Codes

Southwestern Bell Telephone Company (SWBT) respectfully requests that the Commission place BellSouth's March 6, 1992 Petition for Expedited Declaratory Ruling Regarding Assignment of N11 Codes on Public Notice thereby establishing a public comment cycle. Southwestern Bell has a direct interest in this matter because we recently received requests from affiliates of Cox Cable for N11 codes which is the subject of the BellSouth petition.

Southwestern Bell has been examining this petition and has identified several relevant issues that need to be addressed. These issues fall into three major categories:

- Network accommodation of N11 service - Concerns regarding the provisioning of this service need to be addressed.
- Allocation of N11 codes - Concerns regarding both the scarcity and equitable allocation of N11 codes need to be addressed.
- Regulatory response at the state level - Concerns regarding the provisioning of a potential N11 service on an interstate versus an intrastate basis need to be addressed.

Southwestern Bell would like the opportunity to make known to the Commission its position, not only on these major areas, but also on other issues that are certain to emerge with the potential provisioning of these services.

1010 Pine St.
Room 2405
St. Louis, MO 63101

Phone 314 235-7600

The Commission's ruling will have national impact not only on the allocation of N11 codes, but also on any potential N11 service offering. Therefore, any prospective ruling should be made with a clear understanding of all of the issues involved and the potential ramifications of such a decision. While Southwestern Bell favors an expedited resolution of this matter, it would be in the interests of all concerned for the Commission to issue a formal order with the benefit of public comment, rather than disposing of the petition on an informal basis.

For these reasons, Southwestern Bell urges the Commission to place the BellSouth petition on Public Notice and establish a comment cycle.

Should you have any questions regarding this matter, I am available on (314) 235-7600, or members of your staff may contact Mr. Steve Melnikoff in our Washington office on (202) 293-8585.

Sincerely,

D. T. Hubbard

D. T. Hubbard

EXHIBIT 4

LETTER OF ROBERT L. CAPELL, III
TO JAMES T. MCKNIGHT, MARCH 4, 1992